

1 Honorable Robert S. Lasnik  
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10 **IN THE UNITED STATES DISTRICT COURT**  
11 **FOR THE WESTERN DISTRICT OF WASHINGTON**

12 QOTD FILM INVESTMENT LTD.

13 Plaintiff, ) Case No.: 2:16-cv-00371-RSL  
vs. )  
14 BRIAN WILSON ) DEFENDANTS' OPPOSITION TO  
15 Defendants ) PLAINTIFF'S MOTION FOR CONTINUED  
16 ) STAY OF CASE PENDING  
17 BRIAN WILSON, JUDY RUSHING ) REINSTATEMENT  
18 Counterclaimants )  
19 vs. )  
20 QOTD FILM INVESTMENT LTD. )  
21 Cross Defendant )  
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BRIAN WILSON, JUDY RUSHING  
Counterclaimants

vs.

QOTD FILM INVESTMENT LTD.  
Cross Defendant

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## OPPOSITION

Plaintiff, QOTD FILM INVESTMENTS, LTD. (“QOTD”), former copyright holder of the movie “Queen of the Desert”, is an administratively dissolved company organized under the laws of the United Kingdom (“UK”). Plaintiff does not deny this.

QOTD, who was to have been ready for trial at the beginning of May of this year, is now asking this for even a thirty day and/or perpetual extension while they get their corporate affairs straightened out in the U.K. This is the exact same situation in *New Asia. New Asia Enterprises v Fabrique*, 13-CV-5271 (SDNY 1/26/2017). In New Asia, the defendants moved to dismiss because of lack of standing due to corporate dissolution. The plaintiffs in *New Asia* moved the Court for an extension of time. The Court in *New Asia* exercised its discretion and dismissed the case. Defendant respectfully requests that the Court exercised its discretion and follow *New Asia*.

Mr. Amin's declaration is insightful (Docket 133). Paragraphs 7 and 8 of his declaration at Docket 133 are in the future tense, meaning that acts that could have been done on the date of the declaration had not been done. If QOTD was concerned about this case, than everything would have been done long before the date of Mr. Amin's declaration. In fact, QOTD could have had the company reinstated two weeks after defendants had filed their MSJ on February 4, 2018. The parties could have had their trial and this would have been a non-issue.

When this Court issued the Order to Show Cause (Docket 121) it required that the plaintiff show proof of compliance within thirty days. QOTD has not complied and this case should be dismissed.

May 8, 2018

Respectfully Submitted,

/s/ J. Curtis Edmondson

Attorney for the Defendants

## **CERTIFICATE OF SERVICE**

I hereby certify that I served the attached DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTION FOR CONTINUED STAY OF CASE PENDING REINSTATEMENT by CM/ECF to the following person(s) on the date indicated below:

David Allen Lowe  
Lowe Graham jones  
701 5th Ave., Suite 4800  
Seattle, WA 98104-7009

/s/ J. Curtis Edmondson  
DATED: May 8, 2018